REPORTED REQUEST FOR RFC #: 12029

Request for Correction: "BROMATE IS A CARCINOGEN" IS INCORRECT IN ALL USES WHERE NOT PREFIXED WITH POTASSIUM.

Compliance with IQGS: POTASSIUM BROMATE WAS FOUND TO BE A CARCINOGEN, AND A MUTAGEN IN THE RESEARCH PUBLISHED IN EPA DOCUMENTS. IN THE REFERENCES CITED IN THESE DOCUMENTS, IT IS STATED THAT OTHER BROMATES WERE NOT MUTAGENS. DHHS IS RESEARCHING TOXICITY AND IMMUNOSUPPRESSION OF SODIUM BROMATE (RESEARCH REQUESTED BY THE EPA), BUT NO EVIDENCE HAS BEEN FOUND THAT SODIUM BROMATE IS A CARCINOGEN. EXCESSES OF POTASSIUM CONCENTRATE IN THE VERY ORGANS THAT ENDED UP WITH CANCER. ONE COMMON ISOTOPE OF POTASSIUM IS RADIOACTIVE. AN EXCESS OF POTASSIUM IS CARCINOGENIC. "BROMATE" IS NOT A CARCINOGEN. POTASSIUM BROMATE

Recommendation: THE LIMITATION AGAINST BROMATE SHOULD BE RELAXED BY TWO ORDERS OF MAGNITUDE. LEVELS OF POTASSIUM (IN ANY FORM) SHOULD BE ADJUSTED IN ANY "PRODUCT" TO ASSURE THAT A HUMAN DOES NOT GET MORE THAN HIS OR HER NORMAL 3-4 GM PER DAY.

Impact: OZONE HAS BEEN USED IN WATER TREATMENT FOR MORE THAN 100 YEARS. I WORK IN THE OZONE INDUSTRY, AND THIS FINDING IS PUSHING OZONE TO A VERY MINOR POSITION IN BOTTLED AND MUNICIPAL WATER SYSTEMS. REPLACEMENTS PUT MORE CHLORINE IN MY WATER (OXIDATION, PRIMARY DISINFECTION), MORE MERCURY LIBERATED INTO THE ENVIRONMENT (UV LAMPS REQUIRE ANNUAL REPLACEMENT), AND MORE ENERGY CONSUMED (UV IS LESS EFFICIENT, AND CHLORINE COMPOUNDS ARE MORE ENERGY INTENSIVE FROM THE SOURCE).

RFC # 12029 WAS SUBMITTED BY:

DAVID A. SMITH, PHONE: 6235878858 , EMAIL: SMITH@GDT-H2O.COM, ADDRESS: 20805 N. 19TH AVENUE, PHOENIX, AZ 85027, FAX: 6235871511, ORGANIZATION: OZONE INDUSTRY, AFFILIATION: NOT GIVEN

Please remember to copy OEI on all correspondence with the requester. You may copy OEI by including ErrorTracker@sdc-moses.com in the cc: of your e-mail or by mailing (MC 28221T) or faxing (202-566-0255) a copy of the correspondence to us.

If you have questions about this request, please feel free to contact Kimberlie R. Orr at (202)566-1703 or orr.kimberlie@epa.gov.

IQG Processing Staff